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10
11 UNITED STATES DISTRICT COURT, NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13
14 IN RE CALIFORNIA BAIL BOND
15 ANTITRUST LITIGATION

16 THIS DOCUMENT RELATES TO:
17 ALL ACTIONS

Master Docket No. 19-CV-00717-JST

**DECLARATION OF STEFFAN GIBBS IN
SUPPORT OF DEFENDANT ALL-PRO
BAIL BONDS, INC.'S MOTION FOR
RULE 11 SANCTIONS**

18 Date: August 12, 2020
19 Time: 2:00 p.m.
Location: Courtroom 6, 2nd Floor
20 Judge: The Honorable Jon S. Tigar

1 I, Steffan Gibbs, hereby declare as follows:

2 1. I am the CEO of All-Pro Bail Bonds, Inc. ("All-Pro"). In that role, I am familiar with
3 how All-Pro creates and maintains records related to bail transactions.


4 2. At the time All-Pro issues a bail bond to a purchaser, information related to that
5 transaction, including the name of the defendant, the Power Number (a unique identifier associated
6 with each bond), the bond amount, the premium charged, and any rebates issued, among other
7 information, is entered into All-Pro's Customer Relationship Management ("CRM") system. In
8 addition, for each bail bond issued, a Bail Bond Premium Receipt and Statement of Charges is
9 generated at the time of the transaction, containing the same information. These receipts are also
10 stored in the CRM system.

11 3. In mid-April 2020, I extracted information from the CRM system for all bail bonds
12 issued by All-Pro on December 25, 2016, the same date that Plaintiff Shonetta Crain alleges in this
13 lawsuit that she obtained a bail bond from All-Pro. The resulting spreadsheet, which shows the
14 details of 45 bail bonds issued that day and accurately reflects the contents of the CRM, is the
15 document that was attached to All Pro's counsel Shaun Paisley's April 30, 2020 letter to Plaintiffs'
16 counsel, Dean Harvey (with identifying information redacted). I also obtained from the CRM
17 system a sample of ten Bail Bond Premium Receipt and Statement of Charges that were generated in
18 connection with the December 25, 2016 bail transactions. These receipts (again, with identifying
19 information redacted) were also attached to Shaun Paisley's April 30, 2020 letter to Dean Harvey.

20 4. In June 2020, I extracted information from the CRM system for all bail bonds issued
21 by All-Pro on two dates: November 8, 2017 and January 16, 2020. The resulting spreadsheets,
22 which show the details of every bail bond issued on those days and accurately reflect the contents of
23 the CRM, are the documents that were attached to All Pro's counsel Shaun Paisley's June 30, 2020
24 email to Plaintiffs' counsel, Dean Harvey (with identifying information redacted).

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on this 7th day of July, 2020

27 
28 Steffan Gibbs